

**HOGAN & HARTSON LLP**

Attorneys for Defendant

875 Third Avenue

New York, NY 10022

Phone (212) 918-3000

Facsimile (212) 918-3100

AUG 13 2008

AUG 13 2008

1098659-654867

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TOTALMAR NAVIGATION CORP.,	:	
	:	
Plaintiff,	:	Index No. 08-cv-1659 (HB)
	:	ECF Case
-against-	:	
	:	
ATN INDUSTRIES INC.,	:	
	:	
Defendant.	:	
-----	x	

2008 AUG 13 11:21  
S.D. of N.Y.

**UNOPPOSED MOTION TO ADMIT COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, George F. Hritz, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: Julie E. Nevins, Esq.  
Firm Name: HOGAN & HARTSON L.L.P.  
Address: Mellon Financial Center – 19<sup>th</sup> Floor  
1111 Brickell Avenue  
City/State/Zip: Miami, FL 33131  
Phone Number: (305) 459-6500  
Fax Number: (305) 459-6550  
E-Mail Address: [JENevins@hhlaw.com](mailto:JENevins@hhlaw.com)

Julie E. Nevins is a member in good standing of the Bar of the State of Florida.

There are no pending disciplinary proceedings against Julie E. Nevins in any State or Federal Court.

Dated: August 13, 2008  
New York, New York

Respectfully submitted,



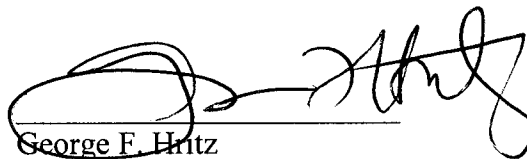
George F. Hritz (GH-9313)  
HOGAN & HARTSON LLP

Attorneys for Defendant  
875 Third Avenue  
New York, NY 10022  
Phone (212) 918-3000  
Facsimile (212) 918-3100  
E-mail: [GFHritz@hhlaw.com](mailto:GFHritz@hhlaw.com)

John F. O'Sullivan  
Hogan & Hartson LLP  
Mellon Financial Center  
1111 Brickell Avenue, Suite 1900  
Miami, FL 33131  
Tel: (305) 459-6500  
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Email: [jfosullivan@hhlaw.com](mailto:jfosullivan@hhlaw.com)

**CERTIFICATE OF CONFERENCE**

I certify that Julie E. Nevins, a Partner with my law firm conferred with Rahul Wanchoo, Esq., counsel for Plaintiff, regarding the relief sought in this motion. Mr. Wanchoo stated that Plaintiff does not oppose this motion.



George F. Hritz

**HOGAN & HARTSON LLP**

Attorneys for Defendant  
875 Third Avenue  
New York, NY 10022  
Phone (212) 918-3000  
Facsimile (212) 918-3100

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**AFFIDAVIT OF GEORGE F. HRITZ IN SUPPORT  
OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

State of New York                     )  
  ) SS:  
County of New York                 )

George F. Hritz, being duly sworn, hereby deposes and says as follows:

1. I am a member of HOGAN & HARTSON L.L.P., counsel for Defendant, ATN Industries Inc. ("ATN"), in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Julie E. Nevins as counsel pro hac vice to represent ATN in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1974. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am a member in good standing of the bar of this Court.

3. I have known Julie E. Nevins since approximately March 2007.

4. Ms. Nevins one of my partners at the law firm of Hogan & Hartson LLP and is resident in our Miami, Florida office.

5. I have found Ms. Nevins to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.


6. Accordingly, I am pleased to move the admission of Julie E. Nevins, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Julie E. Nevins, pro hac vice, which is attached hereto as Exhibit A.

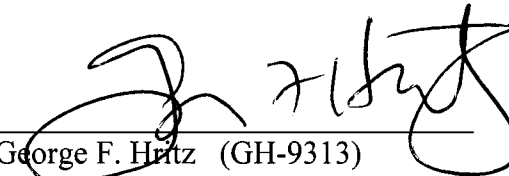
WHEREFORE, it is respectfully requested that the motion to admit Julie E. Nevins, pro hac vice, to represent Defendant, ATN Industries Inc., in the above-captioned matter, be granted.

Dated: August 13, 2008  
New York, New York

Notarized:

  
**EVELYN J. HARROW**  
Notary Public, State of New York  
No. 01HA6098438  
Qualified in Bronx County  
Commission Expires 9/8/11

Respectfully submitted,

  
George F. Hritz (GH-9313)



# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 182206  
Julie E. Nevins  
Hogan & Hartson LLP  
1111 Brickell Ave., Ste. 1900  
Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 24, 1999.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 7<sup>th</sup> day of August, 2008.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is written in a cursive, flowing style.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/ssTH2/R10

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TOTALMAR NAVIGATION CORP.,	:	
	:	
Plaintiff,	:	Index No. 08-cv-1659 (HB)
	:	ECF Case
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	:	
ATN INDUSTRIES INC.,	:	
	:	
Defendant.	:	
-----	x	

**ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION**

Upon the motion of attorney GEORGE F. HRITZ for JULIE E. NEVINS and George F. Hritz's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Julie E. Nevins, Esq.  
Firm Name: HOGAN & HARTSON L.L.P.  
Address: Mellon Financial Center – 19<sup>th</sup> Floor  
1111 Brickell Avenue  
City/State/Zip: Miami, FL 33131  
Phone Number: (305) 459-6500  
Fax Number: (305) 459-6550  
E-Mail Address: [JENevins@hhlaw.com](mailto:JENevins@hhlaw.com)

Julie E. Nevins is admitted to practice pro hac vice as counsel for defendant ATN Industries Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: \_\_\_\_\_, 2008  
New York, New York

\_\_\_\_\_  
The Honorable Harold Baer  
United States District Judge

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TOTALMAR NAVIGATION CORP.,	:	
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	:	ECF Case
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	:	
ATN INDUSTRIES INC.,	:	
	:	
Defendant.	:	
-----	x	

**AFFIRMATION OF SERVICE**

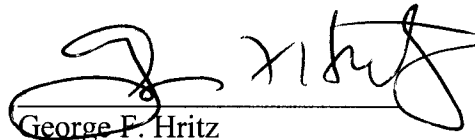
George F. Hritz affirms under penalty of perjury:

I am an attorney admitted to practice in the State of New York and am a partner with the law firm of Hogan & Hartson LLP, attorneys for defendant in the above-captioned matter.

I certify that on August 13, 2008, I filed Defendant's Unopposed Motion to Admit Counsel Pro Hac Vice for Julie E. Nevins with the Clerk of the Court, and it is being served this day on counsel listed below by first class mail and facsimile:

Rahul Wanchoo, Esq.  
Law Offices of Rahul Wanchoo  
Empire State Building  
350 Fifth Avenue, 59<sup>th</sup> Floor  
New York, New York 10118  
*Attorneys for plaintiff Totalmar Navigation Corp.*

Dated: August 13, 2008

  
George F. Hritz